UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTINA ELWELL, Plaintiff, -against- GOOGLE, INC. and TIMOTHY ARMSTRONG, Defendants.	05-CV-06487 (DLC) (JCF) **ECF CASE**

DECLARATION OF JOSHUA L. SOLOMON IN
SUPPORT OF PLAINTIFF'S MOTION TO LIFT LITIGATION STAY

1. I am an associate with the law firm of Sullivan & Worcester LLP, counsel to plaintiff, Christina Elwell, in the above-captioned matter. I offer this declaration in support of plaintiff's motion to lift the litigation stay currently in place in this action.

2. Attached hereto as Exhibit A is a true and accurate copy of a document labeled "Google Inc. Employment, Confidential Information and Invention Assignment Agreement" that defendants filed with this Court in support of their motion to compel arbitration.

3. Attached hereto as Exhibit B is a true and accurate copy of a document, Bates labeled G0002-03, that defendants produced during discovery in the pending arbitration between plaintiff and defendants.

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4. Attached hereto as Exhibit C is a true and accurate copy of a document, Bates labeled G0441-44, that defendants produced during discovery in the pending arbitration between plaintiff and defendants.[1]

5. Attached hereto as Exhibit D is a true and accurate copy of an August 4, 2006 letter from Catherine Harris, Esq., the arbitrator in the pending arbitration between plaintiff and defendants.

6. Attached hereto as Exhibit E is a true and accurate copy of an August 3, 2006 letter from Marina C. Tsatalis, Esq.

7. Attached hereto as Exhibit F is a true and accurate copy of an August 23, 2006 letter from Ilene Robinson Sunshine, Esq.

8. Attached hereto as Exhibit G is a true and accurate copy of an August 29, 2006 letter from Mr. Jose Ibarra, the AAA case manager for the pending arbitration between plaintiff and defendants.

9. Attached hereto as Exhibit H is a true and accurate copy of an April 16, 2007 email from Mr. Jose Ibarra.

10. Attached hereto as Exhibit I is a true and accurate copy of a Stipulation Regarding Exclusion of Witnesses and Evidence.

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[1] Because this document is subject to a protective order that prohibits plaintiff from filing this document without first seeking permission to file it under seal, the version of this declaration being filed electronically does not contain Exhibit C. Plaintiff is filing herewith a motion to file Exhibit C under seal. Upon the Court's ruling on that motion, plaintiff will provide a copy of Exhibit C.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 18, 2007.

s/ Joshua L. Solomon
Joshua L. Solomon